

Message

From: Maria Powell (MEJO) [mariapowell@mejo.us]
Sent: 6/6/2017 7:18:23 PM
To: Ramanauskas, Peter [ramanauskas.peter@epa.gov]
CC: michael.schmoller@wisconsin.gov
Subject: Follow up, Re: question about PCB remediation/closure

Hello again,

Just a reminder--Mike, I'm hoping you can address my questions below.

Expanding a bit on the 2nd question--can you tell me if any contaminant testing (PCBs or anything else) was done on materials inside the Brassworks building? Right now artists are in there working on sculptures and other art for a public open house this weekend.

Thank you,
 Maria

On 5/30/2017 8:40 AM, Maria Powell (MEJO) wrote:

Peter--

Thanks--this is helpful.

A few years ago I copied everything in the Goodman file, including the 2005 documents. I didn't see any maps or data on the Goodman PCB soil sampling. **Mike, did I miss it--and if so, can you share it?**

Thank you for informing the Goodman leaders about proper management of the PCB contaminated materials. On a related note--**Mike, will Goodman be expected to test for PCBs in materials in the Brassworks building that they will be refurbishing soon for their center expansion?**

Thanks, I appreciate the responses.

Maria

On 5/26/2017 3:38 PM, Ramanauskas, Peter wrote:

Hello Maria,

For old industrial properties, sometimes there is little information available on what PCB sources might have been. Section 2.1.5 of the October 2008 Closure Request that you sent me references the September 2005 PCB soil sampling requested by WDNR and indicates there was an August 2005 report and a September 2005 report attachment submitted. Do you have copies of those? If not, please request the information from Mike Schmoller with WDNR (cc'd here) as I imagine those documents would contain the information on the soil sampling that you are interested in, including information about suspected PCB sources.

As to your question about responsibility for proper management of PCBs should they perform reconstruction/renovation that may affect residually impacted areas, the Goodman Center as the

property owner is responsible for proper management of regulated PCB. To that end, we will contact the Goodman Center to inform them of such responsibility.

Thanks,
Peter

-----Original Message-----

From: Maria Powell (MEJO) [mailto:mariapowell@mejo.us]
Sent: Thursday, May 25, 2017 9:26 AM
To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: Re: question about PCB remediation/closure

Peter,

Thank you.

Yes, I know they tested four soil samples for PCBs. As I said below, there are no maps of where they took these four samples and this soil PCB data is not in the files. So we know nothing about where they tested, what they tested, what the detection limits were, etc. There is nothing in any of the reports suggesting that they identified what the sources of PCBs were, where they were, etc.

How can you appropriately assess and remediate a site without knowing the source of the contaminants and how they were used, pathways of release, etc? I believe Wisconsin's NR 700 rules require some of this, but these rules are rampantly ignored at sites in south central Wisconsin. Consequently, we have situations like Madison Kipp--where the PCBs were "discovered" in 2012, after citizens raised questions about them for decades but DNR said they weren't there because they never tested for them. Goodman, of course, has children playing all over it, so the stakes are even higher.

One further question: What entity is responsible to assure that when Goodman does reconstruction inside the building, they handle the PCBs appropriately? The DNR? Goodman? The contractors?

Thanks,
Maria

On 5/24/2017 2:24 PM, Ramanauskas, Peter wrote:

Hello Ms. Powell,

I did look over the information you provided to Gary & me. Given the low PCB levels detected in the building, it appears that the remedial actions taken were appropriate (i.e. capping of the residual in the original floor by approximately 20 inches of new concrete underlain with gravel and the removal, cleaning, and/or encapsulation/marketing of remaining building columns). Although the owner considered the federal PCB cleanup regulations in the actions they took to address the contamination found in the building materials that exceeded 1 mg/kg,

because the as-found concentrations of PCB did not exceed 50 mg/kg, they may not have notified U.S. EPA in light of the regulatory language at 40 CFR 761.50(b)(3). I see that WDNR did request the collection of four soil samples for PCB analysis which resulted in non-detects. Sampling is usually biased to suspected source areas, in this case visibly oil stained areas. Various Federal PCB Policies and Guidance documents may be found here:
<https://www.epa.gov/pcbs/policy-and-guidance-polychlorinated-biphenyl-pcbs>

Please let me know if you have additional questions.

Regards,
 Peter

-----Original Message-----

From: Maria Powell (MEJO)
[\[mailto:mariapowell@mejo.us\]](mailto:mariapowell@mejo.us)
 Sent: Monday, May 22, 2017 8:16 AM
 To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
 Subject: Re: question about PCB remediation/closure

Hi Peter:

I just heard that the Goodman Center is planning to do some remodeling in the building referred to below--and it reminded me of our exchanges.
 Any chance to look the information over yet?

Thanks,
 Maria

On 5/10/2017 9:52 AM, Maria Powell (MEJO) wrote:

FYI, in case you don't already know this, the Goodman Community Center is directly adjacent to Madison Kipp, to the north.

On 5/10/2017 9:39 AM, Maria Powell (MEJO) wrote:

Peter,

Thank you--I appreciate the response. There's no particular rush, just get back to me when you can.

Maria

On 5/9/2017 4:41 PM,
 Ramanauskas, Peter wrote:

Hello Ms. Powell,

Thank you for the additional information. I will look it over so I can better understand the site history and get back to you. In the meantime, I did want to let you know that I will be out of the office tomorrow and will review the information you attached when I return.

Thank you,
Peter

-----Original Message-----
From: Maria Powell (MEJO) [mailto:mariapowell@mejo.us]
Sent: Tuesday, May 09, 2017 3:31 PM
To: Edelstein, Gary A - DNR <Gary.Edelstein@wisconsin.gov>
Cc: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: Re: question about PCB remediation/closure

Thanks Gary, this is helpful. I'm sorry--yes, I mean the closure/registry packet on BRRTS: <http://dnr.wi.gov/botw/DownloadBlobFile.do?docSeqNo=34405>

I didn't realize that contaminated in-place building material

didn't need to be part of this document--so thanks for clarifying that. According to the closure request report, in 2005 a previous consultant gathered four shallow soil samples and had them tested for PCBs and reported that "none of the samples contained detectable concentrations." See attached, pg. 18. This PCB data isn't included with the other data, nor are maps of where the samples were taken, etc (unless I am missing it). They didn't test any other media or do any PCB testing after 2005.

Given the past uses of the building, the fact that PCBs were found throughout the building, past uses of the building, and that it was to be developed into a community center, it seems they would have tested more thoroughly in the soils there. But I don't know what the policies/guidance s are on this, if any.

Mr. Ramanauskas, can you clarify this and my

previous
questions?

Thanks,
Maria

On 5/9/2017 10:55
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Gary A - DNR
wrote:

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(MEJO
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Maria
Powel
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